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March 15, 2023

VIA ECF

The Honorable Sarah Netburn
S.D.N.Y. Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

Defendants write pursuant to Rule III. D of Your Honor's Individual Practices regarding filing redacted documents under seal and in connection with the parties' Protective Order (ECF No. 50) and the Second Circuit's opinion in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Defendants filed under seal Exhibits A, D, E, and G to the March 15, 2023 declaration of Benjamin S. Halperin in support of Defendants' March 15, 2023 letter motion to compel Plaintiff to produce certain communications improperly withheld as privileged. Exhibits A, D, and E consist of Plaintiff's corrected privilege log, supplemental privilege log, and redaction log, respectively, and contain the personal email addresses of Plaintiff and nonparties and also contain descriptions of documents allegedly withheld on privilege grounds. Exhibit G was produced by Plaintiff during discovery and has been marked as "confidential." Although Defendants would not object to these documents being unsealed, they have been filed under seal out of an abundance of caution to protect any privacy concerns of Plaintiff and/or the individuals whose information appears in the sealed documents.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin

Benjamin S. Halperin

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Cc: All counsel of record (via ECF)